

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
GOVERNMENT EMPLOYEES INSURANCE CO.,  
GEICO INDEMNITY CO., GEICO GENERAL  
INSURANCE COMPANY and GEICO  
CASUALTY CO.,

**Docket No.: 15-cv-03135  
(AMD) (SMG)**

Plaintiffs,

**ANSWER TO COMPLAINT**

-against-

ARKADY KINER, L.AC., ARNICA  
ACUPUNCTURE, P.C., STEVEN WOLFSON, L.AC.,  
GLOBAL ACUPUNCTURE, P.C., ALEXANDRA  
SHERESHEVSKAYA, M.D., MODERN  
PSYCHIATRIC SERVICES, P.C., TAMER A. GAD,  
P.T., UNIVERSAL REHAB PT, P.C., CHESTER JAY  
REGANIT TOLENTINO, P.T., SPEEDY WAY PT,  
P.C., YOMAYRA RODRIGUEZ, THERAPEUTIC  
SOLUTIONS MASSAGE THERAPY, P.C.,

-and-

RAFAEL DJAFAROV, ALEXANDER  
SHVARTSBERG and JOHN DOE  
DEFENDANTS 1-10,

Defendants.

-----X  
Defendants, Steven Wolson, L.Ac. and Global Acupuncture, P.C. (collectively “Defendants”,  
or singularly “Defendant” with all terms meaning one in the same), by and through their  
attorneys Abrams, Fensterman, Fensterman, Eisman, Formato, Ferrara & Wolf, LLP, as and for  
their Answer to the Plaintiffs’ Complaint dated February 17, 2016 (the “Complaint”), sets forth  
as follows:

1. Denies knowledge and information sufficient to form a belief as to the allegations  
in paragraph 1 of the Complaint, except to the extent said allegations refer to the Defendant, to  
which extent they are hereby denied.

2. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 2 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

3. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 3 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

4. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 4 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

5. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 5 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

6. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 6 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

7. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 7 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

8. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 8 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

9. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 9 of the Complaint.

10. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 10 of the Complaint.

11. Admit the allegations in paragraph 11 of the Complaint, except denies characterization of ownership.

12. Admit the allegations in paragraph 11 of the Complaint that owns other PCs, but denies the remaining allegations in said paragraph.

13. Denies the allegations in paragraph 13 of the Complaint.

14. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 14 of the Complaint.

15. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 15 of the Complaint

16. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 16 of the Complaint.

17. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 17 of the Complaint.

18. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 18 of the Complaint.

19. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 19 of the Complaint.

20. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 20 of the Complaint.

21. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 21 of the Complaint.

22. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 22 of the Complaint.

23. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 23 of the Complaint.

24. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 24 of the Complaint.

25. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 25 of the Complaint.

26. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 26 of the Complaint.

27. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 27 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

28. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 28 of the Complaint.

29. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 29 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

30. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 30 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

31. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 31 of the Complaint.

32. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 32 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

33. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 33 of the Complaint.

34. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 34 of the Complaint.

35. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 35 of the Complaint.

36. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 36 of the Complaint.

37. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 37 of the Complaint.

38. Neither admit nor deny the allegations contained in paragraph 38 of the Complaint but refers this allegation to the Court for its determination of the laws cited therein.

39. Neither admit nor deny the allegations contained in paragraph 39 of the Complaint but refers this allegation to the Court for its determination of the laws cited therein.

40. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 40 of the Complaint.

41. The allegations in paragraph 41 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

42. The allegations in paragraph 42 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

43. The allegations in paragraph 43 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

44. The allegations in paragraph 44 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

45. Neither admit nor deny the allegations contained in paragraph 45 of the Complaint but refers this allegation to the Court for its determination of the laws cited therein.

46. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 46 of the Complaint.

47. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 47 of the Complaint.

48. The allegations in paragraph 48 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

49. The allegations in paragraph 49 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

50. The allegations in paragraph 50 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

51. The allegations in paragraph 51 of the Complaint state legal conclusions or purport to interpret The New York State Insurance Law and other related laws, statutes and regulations, as such Defendants neither admit nor deny those allegations.

52. The allegations in paragraph 52 of the Complaint state legal conclusions or purport to interpret The New York State Insurance Law and other related laws, statutes and regulations, as such Defendants neither admit nor deny those allegations.

53. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 53 of the Complaint.

54. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 54 of the Complaint.

55. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 55 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

56. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 56 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

57. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 57 of the Complaint.

58. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 58 of the Complaint.

59. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 59 of the Complaint.

60. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 60 of the Complaint.

61. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 61 of the Complaint.

62. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 62 of the Complaint.

63. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 63 of the Complaint.

64. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 64 of the Complaint.

65. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 65 of the Complaint.

66. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 66 of the Complaint.

67. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 67 of the Complaint.

68. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 68 of the Complaint.

69. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 69 of the Complaint.



70. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 70 of the Complaint.

71. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 71 of the Complaint.

72. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 72 of the Complaint.

73. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 73 of the Complaint.

74. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 74 of the Complaint.

75. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 75 of the Complaint.

76. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 76 of the Complaint.

77. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 77 of the Complaint.

78. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 78 of the Complaint.

79. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 79 of the Complaint.

80. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 80 of the Complaint.

81. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 81 of the Complaint.

82. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 82 of the Complaint.

83. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 83 of the Complaint.

84. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 84 of the Complaint.

85. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 85 of the Complaint.

86. Denies the allegations in paragraph 86 of the Complaint.

87. Denies the allegations in paragraph 87 of the Complaint.

88. Denies the allegations in paragraph 88 of the Complaint.

89. Denies the allegations in paragraph 89 of the Complaint.

90. Denies the allegations in paragraph 90 of the Complaint.

91. Denies the allegations in paragraph 91 of the Complaint.

92. Denies the allegations in paragraph 92 of the Complaint.

93. Denies the allegations in paragraph 93 of the Complaint.

94. Denies the allegations in paragraph 94 of the Complaint.

95. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 95 of the Complaint.

96. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 96 of the Complaint.

97. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 97 of the Complaint.

98. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 98 of the Complaint.

99. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 99 of the Complaint.

100. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 100 of the Complaint.

101. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 101 of the Complaint.

102. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 102 of the Complaint.

103. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 103 of the Complaint.

104. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 104 of the Complaint.

105. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 105 of the Complaint.

106. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 106 of the Complaint.

107. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 107 of the Complaint.

108. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 108 of the Complaint.

109. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 109 of the Complaint.

110. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 110 of the Complaint.

111. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 111 of the Complaint.

112. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 112 of the Complaint.

113. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 113 of the Complaint.

114. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 114 of the Complaint.

115. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 115 of the Complaint.

116. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 116 of the Complaint.

117. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 117 of the Complaint.

118. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 118 of the Complaint.

119. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 119 of the Complaint.

120. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 120 of the Complaint.

121. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 121 of the Complaint.

122. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 122 of the Complaint.

123. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 123 of the Complaint.

124. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 124 of the Complaint.

125. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 125 of the Complaint.

126. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 126 of the Complaint.

127. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 127 of the Complaint.

128. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 128 of the Complaint.

129. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 129 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

130. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 130 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

131. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 131 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

132. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 132 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

133. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 133 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

134. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 134 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

135. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 135 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

136. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 136 of the Complaint.

137. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 137 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

138. The allegations in paragraph 138 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

139. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 139 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

140. Neither admit nor deny the allegations contained in paragraph 140 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

141. Neither admit nor deny the allegations contained in paragraph 141 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

142. Neither admit nor deny the allegations contained in paragraph 142 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

143. Neither admit nor deny the allegations contained in paragraph 143 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

144. Neither admit nor deny the allegations contained in paragraph 144 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

145. Neither admit nor deny the allegations contained in paragraph 145 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

146. Neither admit nor deny the allegations contained in paragraph 146 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

147. Neither admit nor deny the allegations contained in paragraph 147 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

148. Neither admit nor deny the allegations contained in paragraph 148 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

149. Neither admit nor deny the allegations contained in paragraph 149 of the Complaint but refer to certification of CPT Codes by AMA for complete recitation of CPT Codes.



150. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 150 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

151. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 151 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

152. Neither admit nor deny the allegations contained in paragraph 152 of the Complaint but refer to certification of CPT Codes by AMA for complete recitation of CPT Codes.

153. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 153 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

154. Neither admit nor deny the allegations contained in paragraph 154 of the Complaint but refer to certification of CPT Codes by AMA for complete recitation of CPT Codes.

155. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 155 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

156. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 156 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

157. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 157 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

158. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 158 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

159. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 159 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

160. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 160 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

161. Neither admit nor deny the allegations contained in paragraph 161 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said paragraph is complete or accurate when considered in the context of this case.

162. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 163 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

163. Neither admit nor deny the allegations contained in paragraph 163 of the Complaint but refer to certification of CPT Codes by AMA for complete recitation of CPT Codes.

164. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 164 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

165. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 165 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

166. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 166 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

167. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 167 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

168. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 168 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

169. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 169 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

170. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 170 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

171. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 171 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

172. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 172 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

173. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 173 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

174. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 174 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

175. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 175 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

176. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 166 of the Complaint.

177. Neither admit nor deny the allegations contained in paragraph 177 of the Complaint but refer to certification of Board Rules for complete recitation thereof.

178. Neither admit nor deny the allegations contained in paragraph 178 of the Complaint but refer to certification of Board Rules for complete recitation thereof.

179. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 179 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

180. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 180 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

181. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 181 of the Complaint.

182. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 182 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

183. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 183 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

184. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 184 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

185. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 185 of the Complaint.

186. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 186 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

187. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 187 of the Complaint.

188. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 188 of the Complaint.

189. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 189 of the Complaint.

190. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 190 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

191. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 191 of the Complaint.

192. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 192 of the Complaint.

193. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 193 of the Complaint.

194. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 194 of the Complaint.

195. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 195 of the Complaint.

196. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 196 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

197. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 197 of the Complaint.

198. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 198 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

199. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 199 of the Complaint.

200. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 200 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

201. The allegations in paragraph 201 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendants neither admit nor deny those allegations.

202. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 202 of the Complaint.

203. Denies the allegations in paragraph 203 of the Complaint.

204. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 204 of the Complaint.

205. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 205 of the Complaint.

206. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 206 of the Complaint.

207. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 207 of the Complaint.

208. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 208 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

209. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 209 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

210. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 210 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

211. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 211 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

212. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 212 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

213. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 213 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

214. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 214 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.



215. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 215 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

216. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 216 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

217. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 217 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

218. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 218 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

219. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 219 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

220. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 220 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

221. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 221 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

222. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 222 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

223. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 223 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

224. The allegations in paragraph 224 of the Complaint state legal conclusions or purport to interpret the “no fault” statute and regulations, as such Defendant neither admits nor denies those allegations.

225. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 225 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

226. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 226 of the Complaint.

227. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 227 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

228. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants’ Answer with the same force and effect as if fully set forth at length herein.

229. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 229 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

230. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 230 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

231. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 231 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied

232. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 232 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

233. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 233 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

234. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 234 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

235. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 235 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

236. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

237. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 237 of the Complaint.

238. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 238 of the Complaint.

239. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 239 of the Complaint.

240. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 240 of the Complaint.

241. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 241 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

242. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 242 of the Complaint.

243. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

244. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 244 of the Complaint.

245. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 245 of the Complaint.

246. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 246 of the Complaint.

247. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 247 of the Complaint.

248. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 248 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

249. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 249 of the Complaint.

250. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

251. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 251 of the Complaint.

252. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 252 of the Complaint.

253. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 253 of the Complaint.

254. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 254 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

255. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 255 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

256. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 256 of the Complaint.

257. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

258. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 258 of the Complaint.

259. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 259 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

260. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 260 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

261. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 261 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

262. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 262 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

263. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

264. Denies the allegations in paragraph 264 of the Complaint.

265. Denies the allegations in paragraph 265 of the Complaint.

266. Denies the allegations in paragraph 266 of the Complaint.

267. Denies the allegations in paragraph 267 of the Complaint.

268. Denies the allegations in paragraph 268 of the Complaint.

269. Denies the allegations in paragraph 269 of the Complaint.

270. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

271. Neither admits nor denies the allegations contained in paragraph 271 of the Complaint but refers this allegation to the Court for its determination of the laws cited therein.

272. Denies the allegations in paragraph 272 of the Complaint.

273. Denies the allegations in paragraph 273 of the Complaint.

274. Denies the allegations in paragraph 274 of the Complaint.

275. Denies the allegations in paragraph 275 of the Complaint.

276. Denies the allegations in paragraph 276 of the Complaint.

277. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

278. Denies the allegations in paragraph 278 of the Complaint.

279. Denies the allegations in paragraph 279 of the Complaint.

280. Denies the allegations in paragraph 280 of the Complaint.

281. Denies the allegations in paragraph 281 of the Complaint.

282. Denies the allegations in paragraph 282 of the Complaint.

283. Denies the allegations in paragraph 283 of the Complaint.

284. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

285. Denies the allegations in paragraph 285 of the Complaint.

286. Denies the allegations in paragraph 286 of the Complaint.

287. Denies the allegations in paragraph 287 of the Complaint.

288. Denies the allegations in paragraph 288 of the Complaint.

289. Denies the allegations in paragraph 289 of the Complaint.

290. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

291. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 291 of the Complaint.

292. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 292 of the Complaint.

293. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 293 of the Complaint.

294. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 294 of the Complaint.

295. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 295 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

296. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 296 of the Complaint.

297. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

298. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 298 of the Complaint.

299. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 299 of the Complaint.



300. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 300 of the Complaint.

301. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 301 of the Complaint.

302. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 302 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

303. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 303 of the Complaint.

304. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

305. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 305 of the Complaint.

306. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 306 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

307. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 307 of the Complaint.

308. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 308 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

309. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 309 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

310. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 310 of the Complaint.

311. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

312. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 312 of the Complaint.

313. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 313 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

314. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 314 of the Complaint.

315. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 315 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

316. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 316 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

317. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

318. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 318 of the Complaint.

319. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 319 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

320. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 320 of the Complaint.

321. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 321 of the Complaint.

322. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 322 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

323. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 323 of the Complaint.

324. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

325. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 325 of the Complaint.

326. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 326 of the Complaint.

327. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 327 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

328. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 328 of the Complaint.

329. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 329 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

330. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 330 of the Complaint.

331. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

332. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 332 of the Complaint.

333. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 333 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

334. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 334 of the Complaint.

335. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 335 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

336. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 336 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

337. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 337 of the Complaint.

338. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

339. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 339 of the Complaint.

340. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 340 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

341. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 341 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

342. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 342 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

343. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 343 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

344. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

345. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 345 of the Complaint.

346. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 345 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

347. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 345 of the Complaint.

348. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 345 of the Complaint.

349. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 349 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

350. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 350 of the Complaint.

351. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

352. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 345 of the Complaint.

353. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 353 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

354. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 354 of the Complaint.

355. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 355 of the Complaint.

356. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 356 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

357. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 357 of the Complaint.

358. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

359. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 359 of the Complaint.

360. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 360 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

361. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 361 of the Complaint.

362. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 362 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

363. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 363 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

364. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 364 of the Complaint.

365. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

366. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 366 of the Complaint.

367. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 367 of the Complaint.

368. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 368 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

369. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 369 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

370. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 370 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

371. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

372. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 372 of the Complaint.

373. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 373 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.



374. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 374 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

375. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 375 of the Complaint.

376. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 376 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

377. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 377 of the Complaint.

378. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

379. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 379 of the Complaint.

380. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 380 of the Complaint.

381. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 381 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

382. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 382 of the Complaint

383. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 383 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

384. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 384 of the Complaint.

385. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

386. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 386 of the Complaint.

387. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 387 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

388. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 388 of the Complaint.

389. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 389 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

390. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 390 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

391. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 391 of the Complaint.

392. Defendants repeat and reallege the answers set forth in all prior paragraphs of the Defendants' Answer with the same force and effect as if fully set forth at length herein.

393. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 393 of the Complaint.

394. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 394 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

395. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 395 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

396. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 396 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

397. Denies knowledge and information sufficient to form a belief as to the allegations in paragraph 397 of the Complaint, except to the extent said allegations refer to the Defendant, to which extent they are hereby denied.

398. Neither admits nor denies the allegations contained in paragraph 389 of the Complaint but refers this allegation to the Court for its determination of the laws cited therein.

**FIRST AFFIRMATIVE DEFENSE**

1. The Plaintiffs' Complaint fails to state a claim upon which relief may be granted.

**SECOND AFFIRAMTIVE DEFENSE**

2. The Plaintiffs' Complaint is barred by the Statute of Frauds.

**THIRD AFFIRMATIVE DEFENSE**

3. The Plaintiffs' Complaint is barred by the Statute of Limitation or otherwise untimely under New York No-fault Insurance Regulations.

**FOURTH AFFIRMATIVE DEFENSE**

4. The Plaintiffs' Complaint is barred by the doctrine of laches.

**FIFTH AFFIRMATIVE DEFENSE**

5. The Plaintiffs' Complaint is barred by the doctrine of unclean hands.

**SIXTH AFFIRMATIVE DEFENSE**

6. The Plaintiffs' Complaint is barred by the doctrine of equitable estoppel.

**SEVENTH AFFIRMATIVE DEFENSE**

7. The Plaintiffs' are barred by the doctrine of *res judicata*.

**EIGHT AFFIRMATIVE DEFENSE**

8. The Plaintiffs' are barred by the doctrine of collateral estoppel.

**NINTH AFFIRMATIVE DEFENSE**

9. The Plaintiffs' are barred by the doctrine of claim preclusion.

**TENTH AFFIRMATIVE DEFENSE**

10. The Plaintiffs' are barred by the doctrine of issue preclusion.

**ELEVENTH AFFIRMATIVE DEFENSE**

11. The Plaintiffs' are barred from recovery for lack of privity.

**TWELFTH AFFIRMATIVE DEFENSE**

12. The Plaintiffs' are barred from recovery as they have failed to satisfy a necessary jurisdictional prerequisite.

**THIRTEENTH AFFIRMATIVE DEFENSE**

13. The Plaintiffs' are barred from recovery by the doctrine of waiver.

**FOURTEENTH AFFIRMATIVE DEFENSE**

14. The Plaintiffs' are barred from recovery by the doctrine of offer and compromise.

**WHEREFORE**, the Defendants request that the Complaint be dismissed in its entirety and for such other and further relief as may be just and equitable.

Dated: New York, New York  
May 6, 2016

ABRAMS, FENSTERMAN, FENSTERMAN,  
EISMAN, FORMATO, FERRARA & WOLF, LLP

*/s/ Mark L. Furman*

By: \_\_\_\_\_  
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